IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HUGHES RIVER FM, LLC, a Delaware limited liability company,

Plaintiff,

v.

XIMALAYA, INC.,
a Cayman Islands corporation,
YU JIANJUN, an individual,
SEAMAN YU, an individual,
XIAOYU CHEN, an individual,
LI HAIBO, an individual,
and TENCENT MUSIC ENTERTAINMENT
GROUP, INC., a Cayman Islands
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

NOTICE OF MOTION TO FILE MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

PLEASE TAKE NOTICE that on September 4, 2025 at 8:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Edmund E. Chang, or any judge sitting in his stead, in Courtroom 2341, in the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Chicago, IL 60604, and then and there present the MOTION TO FOR ENTRY OF CONFIDENTIALITY ORDER, a copy of which is attached and hereby served upon you.

Dated: August 27, 2025

RESPECTFULLY SUBMITTED,

By: <u>/s/ Vincent Filardo, Jr.</u>

Vincent Filardo, Jr. (pro hac vice)
Andrew Sklar (pro hac vice)
Yi He (pro hac vice)
King & Wood Mallesons LLP
500 Fifth Avenue, 50th Floor
New York, NY 10110
(212) 319-4755
vincent.filardo@us.kwm.com
andrew.sklar@us.kwm.com
yi.he@us.kwm.com

Kenneth J. Vanko (ARDC # 6244048) Clingen Callow & McLean, LLC 2300 Cabot Drive, Suite 500 Lisle, Illinois 60532 (630) 871-2609 vanko@ccmlawyer.com

Counsel for Defendant Ximalaya, Inc.

RESPECTFULLY SUBMITTED,

/s/ Todd Gale

Todd Gale (ARDC # 6229288) Lu Harmening (ARDC # 6335999) Dykema Gossett PLLC 10 S. Wacker Drive, Suite 2300 Chicago, IL 60606 312 627-2173 tgale@dykema.com

Timothy J. McCarthy (admission pending)
Dykema Gossett PLLC
Comerica Bank Tower
1717 Main Street, Suite 4200
Dallas, TX 75201
tmccarthy@dykema.com

Mark J. Makoski (admission pending)

RESPECTFULLY SUBMITTED,

By: /s/ Peter P. Tomczak

Peter P. Tomczak (ARDC # 6278608)
Jonathan H. Ebner (ARDC # 6291526)
Laura A. Kelly (ARDC # 6320905)

BAKER & McKENZIE LLP
300 East Randolph Street, Ste. 5000
Chicago, Illinois 60601
(312) 861-8000
peter.tomczak@bakermckenzie.com
jon.ebner@bakermckenzie.com
laura.kelly@bakermckenzie.com

Counsel for Defendant Tencent Music Entertainment Group

Dykema Gossett PLLC 777 Woodward Ave., Suite 400 Detroit, MI 48226 mmakoski@dykema.com

Counsel for Defendants Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [sic] Chen, and Li Haibo

Case: 1:25-cv-06217 Document #: 54 Filed: 08/27/25 Page 4 of 4 PageID #:212

CERTIFICATE OF SERVICE

I, Vincent Filardo, Jr., certify that on August 27, 2025, I electronically filed the foregoing

with the Clerk of the Court using the CM/ECF system, which will send notification of such filings

to all registered users.

Dated: August 27, 2025

By: <u>/s/ Vincent Filardo</u>, <u>Jr.</u>